

1 **THE URBAN LAW FIRM**

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10 *Counsel for Defendant, International Brotherhood
11 of Electrical Workers, Local Union 357*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 DESERT SUN ENTERPRISES LIMITED
15 d/b/a CONVENTION TECHNICAL
16 SERVICES,

17) CASE NO: 2:13-cv-01885-MMD-NJK
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Defendant.)

1) **JOINT STIPULATION AND ORDER TO
2 EXTEND DEFENDANT'S TIME TO
3 RESPOND TO MOTION FOR
4 SUMMARY JUDGMENT**

5) **[First Request]**

6 INTERNATIONAL BROTHERHOOD OF
7 ELECTRICAL WORKERS, LOCAL UNION
8 357, et al.

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Defendant.)

20 Defendant, International Brotherhood of Electrical Workers, Local Union No. 357 ("Local
21 357"), by and through its counsel of record, the Urban Law Firm, and Plaintiff, Desert Sun Enterprises
22 Limited d/b/a Convention Technical Services, by and through its counsel of record, Lionel, Sawyer &
23 Collins, hereby stipulate and request the deadline for Defendant's response to the Plaintiffs Motion for
24 Summary Judgment is extended from June 30, 2014, to July 10, 2014.

25 This request and stipulation is made for good cause and is not made with any intent to delay
26 these proceedings. The purpose of requesting the extension of time to respond to the Motion for
27 Summary Judgment is the parties completed a meet and confer on June 26, 2014, and they have resolved
28 remaining discovery disputes but Defendant needs additional time to respond.

1 An extension of the time to respond will allow the parties to complete resolution of the discovery
2 dispute. For these reasons, the parties, through their respective counsels, submit there is good cause for
3 extending the response deadline to the Motion for Summary Judgment in this matter and request the
4 Court grant the stipulation to extend the Defendant's response deadline from June 30, 2014, to July 10,
5 2014.

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7 Dated: June 30, 2014

LIONEL SAWYER & COLLINS

8
9 /s/ Amy L. Baker
10 Gregory E. Smith, Esq.
11 Nevada Bar No. 1590
12 Amy L. Baker, Esq.
13 Nevada Bar No. 11907
14 *Attorneys for Plaintiff*

15 Dated: June 30, 2014.

THE URBAN LAW FIRM

16 /s/ Nathan R. Ring
17 Nathan R. Ring, Esq.
18 Nevada State Bar No. 12078
19 *Counsel for Defendant, Local 357*

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IT IS SO ORDERED:



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UNITED STATES DISTRICT JUDGE

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22 June 30, 2014
23 Dated: _____